U S DISTRICT COURT DISTRICT OF MAINE BANGOR RECEIVED & FILED

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## UNITED STATES DISTRICT COURT DISTRICT OF MAINE

CHRISTA K. BERRY, CLERK BY

UNITED STATES OF AMERICA	DEPUTY CLERK	
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<b>V.</b>	) Criminal Case No.	1:18-cr- 00017- NT
	) 18 U.S.C. § 844(e)	
NINA MICHALSKI	)	
	)	

## PROSECUTION VERSION OF THE OFFENSE

In October, 2016, the defendant, Nina Michalski, sent two letters from inside the District of Maine to religious congregations in Contra Costa County, California. One letter was received and read by a member of the targeted congregation in Walnut, Creek, California, on October 17, 2016. Another letter was received and read by a member of the second targeted congregation in San Ramon, California, on October 22, 2016. Both of these letters threatened and alleged that a bomb would be planted in the building used for religious services.

In late January, 2017, the defendant sent a third letter from inside the District of Maine to a third congregation in Concord, also in Contra Costa County, California. This letter, received in February 2017, also threatened and alleged that a bomb would be planted in the building used for religious services.

The defendant sent each of these letters using the United States Postal Service. Each letter was postmarked "044," indicating that they originated in eastern Maine. Each letter was delivered by the postal service to the addressee congregation in the State of California. The defendant sent each letter in and through interstate commerce with the intention of maliciously conveying false information to the effect that an explosive had been planted to damage or destroy a building used for religious services, and with the intent to convey a threat to the congregants that would cause fear and apprehension.

If this case were to proceed to trial, the government would produce testimony from the witnesses who received and opened each of the three letters; testimony from law enforcement concerning admissions made by the defendant concerning her actions and motives; the letters sent to San Ramon and Concord, California; and electronically saved documents on the defendant's computer matching one of the letters received in California.

HALSEY B. FRANK

**UNITED STATES ATTORNEY** 

Date: 14 FEBRUARY 2018

Chris Ruge

Assistant U.S. Attorney